

EXHIBIT J

Keith Flynn

From: Keith Flynn
Sent: Friday, March 27, 2015 9:31 AM
To: 'Miglio, Terrence J.'
Cc: 'bebuchanan@varnumlaw.com'
Subject: RE: Reeser

Terrence:

As I indicated in an earlier email, the discovery cutoff is soon approaching. Plaintiff has been courteous in attempting to resolve scheduling difficulties regarding Ms. Hood's deposition.

Have you had time to review Plaintiff's proposed stipulated order regarding Ms. Hood's deposition? Does Defendant concur with the proposed language?

Please advise as soon as possible. I would hope that this matter could be resolved by filing a stipulated order, but without your concurrence with the language, Plaintiff may have to file a motion to preserve her rights.

Please advise.

- Keith

From: Keith Flynn
Sent: Thursday, March 26, 2015 11:56 AM
To: 'Miglio, Terrence J.'
Cc: 'bebuchanan@varnumlaw.com'
Subject: RE: Reeser

Terrence:

I have attached the draft stipulated order regarding Ms. Hood's deposition. Please state whether you concur and provide me with authority to sign on your behalf.

Thank you.

- Keith

From: Keith Flynn
Sent: Thursday, March 26, 2015 11:22 AM
To: 'Miglio, Terrence J.'
Cc: 'bebuchanan@varnumlaw.com'
Subject: RE: Reeser

I just spoke with your paralegal, Joanne, regarding the matter discussed below. She indicated that the deposition of Ms. Hood is not going tomorrow. She told me that you were going to get additional dates of availability and that you were agreeable to a stipulated order extending discovery for the sole purpose of taking Ms. Hood's deposition.

I will forward the draft stipulated order to you later today.

Also, I have not heard back regarding the stipulated protective order. Obviously, the discovery cutoff is soon approaching. I will need a decision on that issue sooner rather than later.

- Keith

From: Keith Flynn
Sent: Thursday, March 26, 2015 9:55 AM
To: 'Miglio, Terrence J.'
Cc: 'bebuchanan@varnumlaw.com'
Subject: RE: Reeser

Terrence:

I have a court reporter waiting on standby. I would like to accommodate Ms. Hood's schedule as much as possible and I certainly hope to provide the court reporter with notice of this change as soon as possible. However, I cannot reschedule Ms. Hood's deposition without your confirmation that I will be able to depose Ms. Hood on another mutually convenient date without running afoul of the Court's Scheduling Order. I need an answer as soon as possible regarding Ms. Hood's availability or Defendant's willingness to sign a stipulated order today extending the discovery period for the sole purpose of taking Ms. Hood's deposition.

If I do not hear back from you by 2pm, I cannot reschedule the deposition. I will continue under the assumption that Ms. Hood will appear for the full-day deposition scheduled for tomorrow that I requested over a month ago.

Please advise.

Thanks.

- Keith

From: Miglio, Terrence J. [mailto:tjmiglio@varnumlaw.com]
Sent: Wednesday, March 25, 2015 12:23 PM
To: Keith Flynn
Subject: RE: Reeser

I will check with her for her availability.

Terrence J. Miglio, Esq.
Direct: (248) 567-7828
Cell: (248) 408-2938



Varnum LLP
39500 High Pointe Blvd., Ste. 350
Novi, Michigan 48375

Main: (248) 567-7400
Fax: (248) 567-7423
www.varnumlaw.com

CONFIDENTIAL

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is only for viewing and use of the intended recipients. If you are not an intended recipient, you are hereby notified that any use, disclosure, or copying is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender at (248) 567-7400

From: Keith Flynn [<mailto:kflynn@millercohen.com>]
Sent: Wednesday, March 25, 2015 12:21 PM
To: Miglio, Terrence J.
Subject: RE: Reeser

My schedule is incredibly busy in the next couple of weeks—I have an arbitration hearing coming up the first week of April. The only day that I am available next week without rescheduling other meetings is Monday. However, I am definitely going to need a full day with Ms. Hood. Please let me know if Monday works.

Thanks.

- Keith

From: Miglio, Terrence J. [<mailto:tjmiglio@varnumlaw.com>]
Sent: Wednesday, March 25, 2015 10:21 AM
To: Keith Flynn
Subject: Reeser

Jill Hood informs me that she is only available Friday morning. She said she can start early on that day. I am trying to reach her to see her actual availability that day. If Friday morning starting early won't provide you with enough time I will get alternate dates from her but it would be easier if you let me know your availability.

Terrence J. Miglio, Esq.
Direct: (248) 567-7828
Cell: (248) 408-2938

VARNUM | 
39500 High Pointe Blvd., Ste. 350
Novi, Michigan 48375

Main: (248) 567-7400
Fax: (248) 567-7423
www.varnumlaw.com

CONFIDENTIAL

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is only for viewing and use of the intended recipients. If you are not an intended recipient, you are hereby notified that any use, disclosure, or copying is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender at (248) 567-7400
